



**MEYER ♦ DARRAGH**  
**BUCKLER BEBENEK & ECK, P.L.L.C.**

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**Richard S. Canciello**  
Attorney-at-Law

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**E-mail Address:** rcanciello@mdbbe.com

**FILE COPY**

Please refer to: DON.106645

May 13, 2005

Carl R. Schiffman, Esquire  
Schiffman & Wojdowski  
1300 Fifth Avenue  
Pittsburgh, PA 15219-6270

RE: Foster v. Hajduk, Kerna and Schreckengost Contracting

Dear Carl:

Enclosed please find the Second Set of Expert Discovery Requests Directed to Plaintiff in the above-captioned matter.

I will await your timely responses.

Thank you for your attention hereto.

Very truly yours,

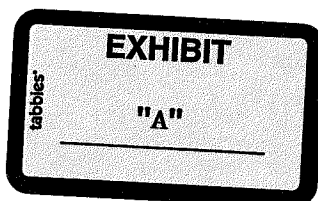
A handwritten signature in black ink, appearing to read "Richard S. Canciello", written over the typed name.

RICHARD S. CANCIELLO

RSC:mar  
Enclosure

cc: Marna K. Blackmer, Esquire (w/enclosure)

P0737701.1



IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DALE FOSTER,

Plaintiff,

vs.

MICHAEL HAJDUK, P. DAVID KERNA,  
and SCHRECKENGOST CONTRACTING,

Defendants.

Case No. 03-328E

**SECOND SET OF EXPERT DISCOVERY REQUESTS DIRECTED TO PLAINTIFF**

TO: Dale Foster, Plaintiff  
c/o Carl R. Schiffman, Esquire  
Schiffman & Wojdowski  
1300 Fifth Avenue  
Pittsburgh, PA 15219-6270

AND NOW, comes the Defendant, SCHRECKENGOST CONTRACTING, by and through its counsel, MEYER, DARRAGH, BUCKLER, BEBENEK & ECK, P.L.L.C., and pursuant to the Federal Rules of Civil Procedure, hereby makes the following Second Set of Expert Discovery Requests Directed to Plaintiff for the production of documents as enumerated below. Unless otherwise agreed, production, inspection and copying of all documents to be produced will be at the office of the undersigned counsel within the next thirty (30) days.

1. Please submit a copy of the "summary of the accident," as referenced by Jack G. Murray in his report of March 28, 2005.

Respectfully submitted,

MEYER, DARRAGH, BUCKLER,  
BEBENEK & ECK, P.L.L.C.

Date: May 13, 2005



RICHARD S. CANCELLO, ESQUIRE  
PA I.D. No. 73174

U.S. Steel Tower, Suite 4850  
600 Grant Street  
Pittsburgh, PA 15219  
(412) 261-6600

Attorneys for Defendant,  
Schreckengost Contracting

### PROOF OF SERVICE

I hereby certify that I am serving the foregoing document upon the persons and in the manner listed below:

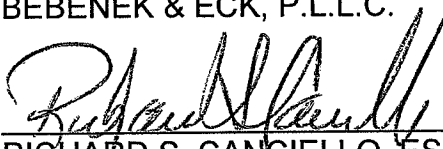
Service by First-Class Mail, addressed as follows:

Carl R. Schiffman, Esquire  
Schiffman & Wojdowski  
1300 Fifth Avenue  
Pittsburgh, PA 15219-6270  
(Counsel for Plaintiff)

Marna K. Blackmer, Esquire  
Summers, McDonnell, Walsh & Skeel  
707 Grant Street  
Gulf Tower 2400  
Pittsburgh, PA 15219  
(Counsel for Defendants, Michael Hajduk and P. David Kerna)

MEYER, DARRAGH, BUCKLER,  
BEBENEK & ECK, P.L.L.C.

Date: May 13, 2005

  
RICHARD S. CANCIELLO, ESQUIRE